



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7  
901 NORTH 5TH STREET  
KANSAS CITY, KANSAS 66101

DEC 07 2011

Mr. Jonathan K. Markoff  
Compass Big Blue, LLC  
1302 West Randolph Street  
Chicago, Illinois 60607

Mr. John M. Kupar  
DeNovo Properties, Incorporated  
1300 West Randolph Street  
Chicago, Illinois 60607

RE: Approval of the Revised Report for the Notification & Certification of Self- Implementing  
Cleanup and Disposal of PCB Remediation Waste at the Former GST  
Steel Facility, Tract F-7, 8116 Wilson Road, Kansas City, Missouri, Dated November 14, 2011  
EPA ID No. MOD007118029

Dear Messers Markoff and Kupar:

The U.S. Environmental Protection Agency Region 7's has reviewed the subject document and is approving of it with the following conditions.

1. The remediation of additional polychlorinated biphenyl (PCB)-contaminated material and verification sampling should be conducted in accordance with previously approved work plans and the provisions set forth in 40 CFR Part 761.61.
2. Sufficient post-excavation verification samples must be collected in both the vertical and horizontal horizons to confirm that the proposed action level has been achieved.
3. As a reminder, the final approved version of remediation reports should be sent to the Director of the Missouri Department of Natural Resources (MDNR) and the Environmental Director of Jackson County or the City of Kansas City, Missouri as required by 40 CFR § 761.61(a)(ii)(3).
4. Pages 5 and 6 of the report should be revised and re-submitted to the EPA and MDNR to include a schedule for the proposed work. Should the schedule need to be changed due to unforeseen circumstances, the EPA and MDNR should be notified of the changes as soon as possible. Schedule coordination and early notification of schedule changes are necessary so that the EPA and MDNR are provided the opportunity to make arrangements for oversight of the proposed remediation activity. In addition, the fourth complete sentence on page 6 should be edited to indicate that when field screening methods indicate PCB concentrations are below 1 part per million, it will be presumed that the remediation limit will have been met. This is because only results from laboratory analysis of verification samples can support the completion of PCB remediation.

If you have any questions, or wish to discuss these comments, I can be reached by phone at (913) 551-7755 or by email at [morrison.bruce@epa.gov](mailto:morrison.bruce@epa.gov).

Sincerely,

A handwritten signature in cursive script that reads "Bruce A. Morrison".

Bruce A. Morrison  
Project Manager  
Waste Remediation and Permitting Branch  
Air and Waste Management Division

cc: Christine Kump-Mitchell, MDNR  
Rich Nussbaum, MDNR  
Glen Schwartz, Mile Rail, LLC